

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	X		
	:		
In re	:		Chapter 11
	:		
FIELDWOOD ENERGY LLC, et al.¹,	:		Case No. 20-33948 (MI)
	:		
	:		(Jointly Administered)
Debtors.	:		
	X		

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned counsel hereby appears on behalf of David M. Dunn, as Plan Administrator (the “Plan Administrator”) of *Fieldwood Energy LLC* and its affiliated debtors pursuant to the *Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors* [Docket No. 1742], and request copies of all notices, pleadings, orders, and other documents brought before this Court with respect to the above-captioned proceedings, whether formal or informal, be served on the Plan Administrator by and through his counsel, as follows:

[Intentionally Left Blank]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Kristopher M. Hansen, Esq.
Kenneth Pasquale, Esq.
Gabriel Sasson, Esq.
John F. Iaffaldano, Esq.
STROOCK & STROOCK & LAVAN LLP
180 Maiden Lane
New York, NY 10038
Telephone: (212) 806-5400
Email: khansen@stroock.com
Email: kpasquale@stroock.com
Email: gsasson@stroock.com
Email: jiaffaldano@stroock.com

-and-

Michael D. Warner, Esq.
Benjamin L. Wallen, Esq.
PACHULSKI STANG ZIEHL & JONES LLP
440 Louisiana Street, Suite 900
Houston, TX 77002
Telephone: (713) 691-9385
Facsimile: (713) 691-9407
Email: mwarner@pszjlaw.com
Email: bwallen@pszjlaw.com

PLEASE TAKE FURTHER NOTICE that this request includes, without limitation (i) all notices and papers referred to in Bankruptcy Rules 2002, 3017, 9007, 9010 and 1109(b), (ii) all notices of hearings and entry of orders, (iii) every order signed in these cases, and (iv) every pleading or report filed in these cases, including, without limitation, schedules, statements of affairs, operating reports, motions, applications, complaints, demands, requests, petitions, plans of reorganization, disclosure statements, answering or reply papers, and memorandum briefs in support of any of the foregoing.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any prior or later appearance, pleading, claim, or suit shall waive any right of the Plan Administrator to (1) have final orders in non-core matters entered only after *de novo* review by a District Court judge, (2) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to

these cases, (3) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) any objection to the jurisdiction of the Bankruptcy Court for any purpose, (5) any election of remedy, or (6) any other right(s), claim(s), defense(s), setoff(s) or recoupment(s), under agreements, in law, in equity, or otherwise, all of which are expressly reserved.

Dated: September 3, 2021

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES, LLP

/s/ Michael D. Warner

Michael D. Warner (TX Bar No. 00792304)
Benjamin L. Wallen (TX Bar No. 24102623)
440 Louisiana Street, Suite 900
Houston, TX 77002
Telephone: (713) 691-9385
Facsimile: (713) 691-9407
Email: mwarner@pszjlaw.com
Email: bwallen@pszjlaw.com

-and-

Kristopher M. Hansen (*pro hac vice* pending)
Kenneth Pasquale (*pro hac vice* pending)
Gabriel Sasson (*pro hac vice* pending)
John F. Iaffaldano (*pro hac vice* pending)
STROOCK & STROOCK & LAVAN LLP
180 Maiden Lane
New York, NY 10038
Tel: (212) 806-5400
Email: khansen@stroock.com
Email: kpasquale@stroock.com
Email: gsasson@stroock.com
Email: jiaffaldano@stroock.com

Counsel for the Plan Administrator

CERTIFICATE OF SERVICE

I certify that on September 3, 2021, a true and correct copy of the foregoing Notice of Appearance was served by this court's CM/ECF to all parties that are registered to receive such notice in the above cases.

/s/ Michael D. Warner

Michael D. Warner